

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:20-cv-00947-TMC

**CONSENT MOTION FOR
EXTENSION OF TIME**

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiff may file a response to Defendant Limestone's Motion to Dismiss. (See Dkt. No. 70).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiffs to extend the time to file a Response by (14) fourteen days. The current due date is December 15, 2020. The new due date would be December 29, 2020.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiff, respectfully requests this Court grant Plaintiff's Motion and enter an order extending the time in which he may file a Response by an additional fourteen (14) days.

HAVING SEEN AND AGREED:

BELL LEGAL GROUP, LLC

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)
Joshua M. W. Salley (#13214)
BELL LEGAL GROUP, LLC
219 North Ridge Street
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@edbelllaw.com
jsalley@edbelllaw.com
Counsel for Plaintiffs

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted *Pro Hac Vice*)
Liz J. Shepherd (admitted *Pro Hac Vice*)
Jordan A. Stanton (admitted *Pro Hac Vice*)
DOLT, THOMPSON, SHEPHERD & CONWAY, PSC
13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
jstanton@kytrial.com
Counsel for Plaintiffs

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II

JOSEPH Y. RAHIMI II
Federal ID No. 9670
JOHN A. HUBERT
Federal ID No. 13154
33 Bull Street, Suite 590
Savannah, Georgia 31401

(912) 421-9988

jrahi@rhp-law.com

jhubert@rhp-law.com

**ATTORNEYS FOR DEFENDANT
LIMESTONE UNIVERSITY**

JENNIFER S. CLUVERIUS

Federal ID No. 9992

L. GRANT CLOSE III

Federal ID No. 10810

**ATTORNEYS FOR DEFENDANT
LIMESTONE UNIVERSITY**

NEXSEN PRUET, LLC

55 East Camperdown Way, Suite 400 (29601)

Post Office Drawer 10648

Greenville, South Carolina 29603-0648

Phone: (864) 370-2211

jcluverius@nexsenpruet.com

gclose@nexsenpruet.com